



**PFIZER PIGMENTS INC.**

A subsidiary of Pfizer Inc.  
2001 Lynch Avenue, East St. Louis, Ill. 62205

EPA Region 5 Records Ctr.



390922

June 12, 1989

Mr. Kenneth G. Mensing  
Regional Manager  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2009 Mall Street  
Collinsville, IL 62234

Dear Mr. Mensing:

Enclosed is the previously submitted Part A Withdrawal Form, which was sent to Mr. Charles Zeal on January 28, 1988. This submittal, which is labeled Attachment A in this response, contains the information you asked for as part of your May 22, 1989 cover letter.

Also enclosed is the Form 8700-12 you sent to be returned to your office. It was indicated that this form, labeled Attachment B, will allow Pfizer's RCRA status to be reclassified as a small quantity generator.

As part of Attachment C, correspondence supporting the Part A withdrawal is included. A letter dated March 22, 1988, written by Mr. Lawrence W. Eastep, Manager of the Division of Land Pollution Control Permit Section, indicated that Pfizer's RCRA Part A should be withdrawn.

Also included as part of Attachment C is a letter dated October 23, 1987 from Mr. Eastep, which exempted Pfizer's use of Pickle Liquor from the hazardous waste regulations under RCRA.

Please direct any questions to Christopher G. Dorow, our Safety/Environmental Engineer.

Sincerely,

Roger E. Rader  
Plant Manager

Attachments

cc: J. C. Carlton  
C. G. Dorow

Attachment A: Part A Withdrawal Form and  
Cover Letter Submitted January 28, 1988.



**PFIZER PIGMENTS INC.**

A subsidiary of Pfizer Inc.

2001 Lynch Avenue, East St. Louis, Ill. 62205

January 28, 1988

Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62706

Attn: Mr. Charles Zeal

Dear Mr. Zeal:

Enclosed as per our conversations of January 4th and 5th is Pfizer's request to withdraw from our Part A Permit. This includes not only the withdrawal request form but also the earlier correspondence between Pfizer and IEPA.

As I explained to you, Pfizer does intend to keep our hazardous waste generator's ID number to use when we must dispose of a hazardous material. Although this is not a common occurrence, hazardous wastes are occasionally generated when obsolete laboratory chemicals are eliminated, materials are produced during plant trials of new processes, etc...

In addition, Pfizer's change in regulatory status will not change the actual operations at our facility. The same tanks will be used to produce our products, regardless of our status as a treatment facility. Thus, there is no need to go through the closure plan that was developed for this operation.

Please contact me if you have any questions regarding our request.

Sincerely,

Jeffrey C. Carlton, P.E.  
Safety/Environmental Engineer

JCC:jn  
Enc.

# FACILITY PART A WITHDRAWAL REQUEST FORM

Complete and Submit to:

Illinois Environmental Protection Agency  
Attn: Carrie Agrall  
Division of Land Pollution Control #24  
Permit Section  
2200 Churchill Road  
Springfield, IL 62706

Date: 01 / 29 / 88

Facility Name: Pfizer Inc.  
(As it appears on the Federal Printout or on the accepted Part A)

Federal ID Number: I L D 0 0 6 3 1 7 1 1 9

State ID Number: 1 6 3 0 4 5 0 0 3 4

Location of Facility: 2001 Lynch Avenue  
(Street Address)

<u>East St. Louis</u> (City)	<u>62205</u> (Zip Code)	<u>St. Clair</u> (County)
Jeffrey C. Carlton, P.E.		
Contact Person & Phone #:	<u>Safety/Environmental Engineer</u> (Name and Title)	<u>(618) 271 - 4700</u>

A representative of our facility previously submitted a Part A RCRA Interim Status Permit Application indicating the handling of hazardous waste by the following process(es):

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
Tank T01 <u>    </u>	Container (barrel, drum, etc.) S01 <u>    </u>	Injection Well D79 <u>    </u>
Surface Impoundment T02 <u>    </u>	Tank S02 <u>  X  </u>	Landfill D80 <u>    </u>
Incineration T03 <u>    </u>	Waste Pile S03 <u>    </u>	Land Application D81 <u>    </u>
*Other T04 <u>  X  </u> (Specify Below)	Surface Impoundment S04 <u>    </u>	Ocean Disposal D82 <u>    </u>
* See attached page 1A		Surface Impoundment D83 <u>    </u>

PAGE 1-A

FACILITY PART A WITHDRAWAL  
PFIZER PIGMENTS, INC.

DESCRIPTION OF TREATMENT (T04)

Pfizer purchases spent pickle liquor (K062) from steel operations to use as a substitute for a raw material (virgin sulfuric and hydrochloric acid) in the manufacture of iron oxide products.

The manufacturing process begins by reacting scrap iron with either the spent pickle liquor or virgin acid in large, heated reactor tanks (neutralizers). The acid is neutralized during the reaction with the iron, which produces either a ferrous sulfate solution or a ferrous chloride solution. These neutralized solutions are then transferred to other tanks where the remaining solids settle. The clear solutions are then reacted to allow the iron salts to precipitate as iron oxide. The oxide then passes through several additional steps to produce our final products.

Pfizer's use of the spent pickle liquor as a substitute for raw acid is described in greater detail in the attached correspondence between Pfizer and IEPA.

The Part A was filed in error for the following reason(s):

	<u>COMMENTS*</u>
<input type="checkbox"/> A. Asbestos	_____
<input type="checkbox"/> B. Drum Recycling	_____
<input type="checkbox"/> C. Elementary Neutralization**	_____
<input type="checkbox"/> D. Elementary Neutralization and Wastewater Treatment Unit**	_____
<input type="checkbox"/> E. Exempted Waste	_____
<input type="checkbox"/> F. Non-Hazardous Waste	_____
<input type="checkbox"/> G. Pickle Liquor***	_____
<input type="checkbox"/> H. Protective Filer	(K062)
<input checked="" type="checkbox"/> J. Raw Materials	Spent pickle liquor is used as a substitute for a material (virgin sulfuric or hydrochloric acid) in the production of iron oxide materials. See attached correspondence between Pfizer and Illinois EPA.
<input type="checkbox"/> K. Recycling (Specify type of recycling, and exemption claimed)	_____
<input type="checkbox"/> M. Small Quantity Generator	_____
<input type="checkbox"/> N. Storage less than 90 days	_____
<input type="checkbox"/> P. Transfer Facility	_____
<input type="checkbox"/> Q. Transporter	_____
<input type="checkbox"/> R. Wastewater Treatment Unit**	_____
<input type="checkbox"/> S. Non-Existing Facility (Never Built)	_____
<input type="checkbox"/> T. Other	_____
	_____
	_____

Include copies of any supportive documents (i.e., waste analysis, manifests, amended Part A's, etc.) to substantiate non-regulated claim.

\* Comment Section should be used to explain in detail the reason for claiming non-regulated status. If more than one reason is checked, each comment should reflect the alpha letter next to each explanation.

\*\* Whenever a Treatment Exemption is claimed, the Comment Section should indicate what process generated the waste (i.e., plating operation, metal heat treating, etc.).

\*\*\* Other than spent pickle liquor generated by steel finishing operations of plants that produce iron and/or steel.

Based on the above information (check one):

- ☐ 1. Please withdraw the RCRA Part A Permit Application as our facility never treated, stored (more than 90 days) or disposed of hazardous waste since November 19, 1980 and is currently not regulated.
- ☐ 2. Please withdraw the RCRA Part A Permit Application as our facility is exempt from regulation.
- ☒ 3. # Please withdraw the RCRA Part A Permit Application and change the regulated status to:
- ☒ a. Generator
- ☐ b. Transporter

# (If number 3 is checked, a new or subsequent 8700-12 (EPA Hazardous Waste Notification) may be required).

I am aware that should our facility treat, store, or dispose of  
(i.e., transport, generate, treat, store or dispose of) any hazardous waste in the future, we would be required to comply with the permitting  
(i.e., notification and/or permitting) requirements of RCRA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Roger E. Rader                      Plant Manager  
\_\_\_\_\_  
+(Name and Title - Date)

+ (Signature must be in compliance with 702.126 (i.e., responsible corporate officer or designee, general partner or the proprietor, principal executive officer of an agency, etc.)

BB:tk:3/1/42(8/5/86)

Attachment B: The Form 8700-12 Submitted May 4, 1989





**PFIZER PIGMENTS INC.**

A subsidiary of Pfizer Inc.  
2001 Lynch Avenue, East St. Louis, Ill. 62205

RECEIVED

MAY - 5 1989

IEPA-DLPC

CERTIFIED MAIL

May 4, 1989

Mr. Mike Walwer  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Information Management Section  
2200 Churchill Road  
Springfield, IL 62794

RECEIVED  
IEPA

COLLINSVILLE OFFICE

Dear Mr. Walwer:

Enclosed is Pfizer's completed Form 8700-12, filed in response to the Illinois Environmental Protection Agency's letter of April 7, 1989. Pfizer would like to withdraw from its treater, storer, or disposer status, and be classified as a small quantity generator.

If you have any questions, please direct them to our Safety/Environmental Engineer, Mr. Christopher Dorow.

Sincerely,

Roger E. Rader  
Plant Management

cc: J. C. Carlton  
C. G. Dorow

Attachment

rm

**FACILITY NOTIFICATION**  
**(8700-12)**  
**AMENDMENT OR WITHDRAWAL REQUEST FORM**

Complete and Return to:

Illinois Environmental Protection Agency  
Attn: ~~Brian Newquist~~ Mike Walwer  
Division of Land Pollution Control #24  
Compliance Monitoring Section  
2200 Churchill Road  
Springfield, IL 62706

Date:   4   /  2  / 89

Facility Name: Pfizer Pigments Inc.

(As it appears on the Federal Printout or on the  
Acknowledgement Letter)

Federal ID Number:  I   L   D   0   0   6   3   1   7   1   1   9 

State ID Number:  1   6   3   0   4   5   0   0   3   4 

Location of Facility: 2001 Lynch Avenue  
(Street Address)

East St. Louis, IL      62205      St. Clair  
(City)                      (Zip Code)      County

Contact Person & Phone #: Christopher G. Dorow      (618) 271 - 4700  
(Name and Title)                      (Phone Number)

**FOR IEPA USE ONLY**

According to our records, a representative of your facility previously notified the USEPA/IEPA of the following hazardous waste activity(s).

Generator \_\_\_\_\_ Treatment/Storage/Disposal \_\_\_\_\_ Transporter \_\_\_\_\_  
(No Part A Submitted)

This notification indicated the following hazardous waste was being handled.

\_\_\_\_\_  
\_\_\_\_\_

(List the 4 digit EPA Hazardous Waste Number as indicated on the 8700-12)

                      
Date of Inspection

                      
Inspector

                      
Date

However, the current status of this facility is:

- ☐ 1. Non-handler.
- ☒ 2. Small Quantity Generator (100 - 1000 kg per month).
- ☐ 3. Facility could not be located.
- ☐ 4. RCRA exempt hazardous waste handler (other than recycler).
- ☐ 5. RCRA exempt recycler.
- ☐ 6. Notified as TSD (No Part A); regulated as Generator.
- ☐ 7. Non-handler (retaining ID # for possible future use or needs ID # to have waste accepted by transporter).
- ☐ 8. Generator of less than 100 kg per month.
- ☐ 9. Non-TSD facility (Closed Gen./Trans.).

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Describe reason(s) for claiming non-regulated status, exemption being claimed, quantities, names and disposition of waste, etc.)

Include copies of any supportive documents (i.e., waste analysis, notifications, manifest copies).

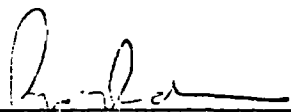
Therefore, please (circle one) withdraw or amend the status of the notification form(s) to reflect the current status above.

Should you have any questions, please contact Christopher G. Dorow  
(Name and Title)

Safety/Environ. Engineer at 618-271-4700  
(Telephone Number)

I am also aware that, should our facility handle hazardous waste in the future, our facility would be required to comply with the applicable notification and permitting requirements.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



5/4/89

(Signature of Owner/Operator or Authorized Representative - Date)  
Roger E. Rader, Plant Manager

BB:tk:3/1/40(8/5/86)

Attachment C: Correspondence Supporting  
Withdrawal of Part A Application



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1630450034 -- St. Clair County  
East St. Louis/Pfizer  
ILD006317119 -- Part A Log 183

March 22, 1988

Pfizer, Inc.  
Attn.: Jeffrey C. Carlton, P.E.  
2001 Lynch Ave.  
East St. Louis, IL 62205

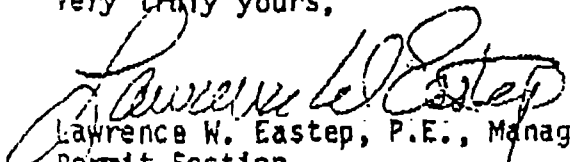
Dear Mr. Carlton:

This is in response to your request to withdraw the Part A Application for the subject facility. An Agency review of records on February 8, 1988 confirms that this facility should be reclassified as a generator only status and the Part A withdrawn.

Your I.D. number (ILD006317119) will be retained in case this facility generates, stores, treats or disposes of regulated quantities of hazardous waste in the future.

Should you have any questions regarding this matter, please contact Eugene W. Dingleline at (217) 782-5504.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:EWD:ct/797J,35

cc: Southern Region  
Compliance Monitoring  
Division File - RCRA Part A  
USEPA - Jim Mayka  
USEPA - Mary Murphy  
USEPA - Art Kawatachi

✓

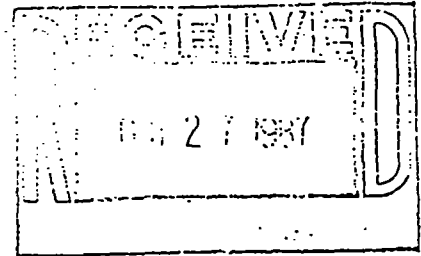


217/782-6761

Refer to: 1630450034 - St. Clair County  
Pfizer Pigments, Inc.  
IL0006307119  
RCRA - General

October 23, 1987

Mr. Roger E. Rader  
Plant Manager  
Pfizer Pigments, Inc.  
2001 Lynch Avenue  
East St. Louis, IL 62205



Dear Mr. Rader:

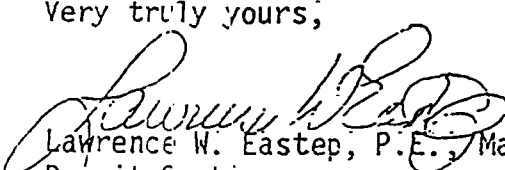
This letter is to clarify the Agency's August 27, 1987 letter regarding the regulatory status of spent pickle liquor from steel operations which is used to produce iron oxide products at Pfizer Pigments, Inc.

Based on the description provided in your letter, it is the Agency's opinion that the spent pickle liquor is used as an effective substitute for a commercial product. Therefore, pursuant to 35 Ill. Adm. Code 721.102(e)(1)(B) it is not classified as a solid waste nor as a hazardous waste under RCRA when it is recycled in this manner. Furthermore, because it is not a solid waste it is excluded from regulation under 35 Ill. Adm. Code 702, 703, 705 and 722 through 726.

The Agency also recommends that Pfizer Pigments withdraw the Part A dated November 13, 1980 in order to correct the regulatory status of the facility.

If you have any questions regarding this matter, please feel free to call Rob Watson at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WRW:bjh/3976g/73

CC: Southern Region  
Division File  
Harry Chappel  
Gary King



## PFIZER PIGMENTS INC.

A subsidiary of Pfizer Inc.

2001 Lynch Avenue, East St. Louis, Ill. 62205

August 5, 1987

Mr. Larry Eastep, Manager  
Land Pollution Control Division  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Eastep:

As a result of recent changes in the regulations defining solid waste and recycled materials, Pfizer believes that our East St. Louis iron oxide production facility (which uses spent pickle liquor from steel operations (K062) as a substitute for virgin acid) is no longer classified as a hazardous waste treatment site under the RCRA regulations. The purpose of this letter is to affirm our understanding of the regulations.

On July 13, 1987; our Mr. Jeff Carlton spoke with Mr. Rob Watson of your office regarding the classification of Pfizer's East St. Louis facility as a hazardous waste storage/treatment site. Mr. Watson suggested that we send a letter to your attention explaining our situation.

In a letter dated September 18, 1986, Mr. Eugene Theios (Manager of the Disposal Alternatives Unit of your Division) stated that Pfizer has the option of using spent pickle liquor directly, without reclamation, in which case it is no longer a solid waste.

Pfizer wishes to verify Mr. Theios' September 18, 1986 letter and further clarify the status of our facility.

Pfizer Pigments Inc. manufactures a variety of iron oxide and natural barium sulfate products at the East St. Louis location. The iron oxide products are used primarily as raw materials in the coatings and magnetic tape industries. The basic iron oxide production process for both the pigments and magnetics products is illustrated in the attached diagram and described below.

### NEUTRALIZATION

The production of iron oxide products begins with the neutralization step, in which scrap iron is dissolved in an acid source (sulfuric acid or hydrochloric acid). This process takes place in large heated reactor tanks called neutralizers. The acid is "neutralized" by the scrap iron, resulting in





Mr. Larry Eastep  
August 5, 1987  
Page 2

either a ferrous sulfate solution (when the iron reacts with the sulfuric acid source) or a ferrous chloride solution (when a hydrochloric acid source is used). The reaction continues until the pH of the solution exceeds 4.0. In order to assure that the quality of the final products remains consistent, only scrap iron and virgin acids or spent pickle liquor (K062) which do not contain significant amounts of tin, chromium, zinc, and other metals are used. The presence of these materials in the succeeding manufacturing steps would produce off-quality final products. Therefore, our raw materials (the scrap metal and the acid sources) are routinely analyzed to ensure that they do not contain excessive levels of these compounds.

#### CLARIFICATION

After neutralization, the ferrous chloride or sulfate solution is transferred into clarification tanks. Here, the solids that are suspended in the solution settle out. These solids are caused by various impurities from both the scrap iron and acid sources, such as sand, dirt, etc.

The settled solids are transferred to our wastewater treatment operation. Here, lime is added to increase the pH of the total wastestream to 7 - 8. Next, the neutralized wastewater is pumped to a clarifier, where the solids settle out. The solids are dewatered on a rotary vacuum filter and then hauled to a landfill as a special, non-hazardous industrial waste. The effluent from the clarifiers goes to the American Bottoms Regional Wastewater Treatment Plant in Sauget. The wastes generated by the production of the iron oxide products are the same regardless of whether spent pickle liquor (K062) or virgin acid is used in the neutralizing operation.

#### REMAINDER OF PROCESS

After the solids are removed from the ferrous sulfate and chloride solutions, the solutions are pumped to storage tanks. Next, the iron oxide is precipitated using either scrap iron, ammonia or sodium hydroxide. The insoluble iron oxide product is then settled, washed on vacuum and pressure filters, dried, and packed for shipment to our customers.

#### USE OF SPENT PICKLE LIQUOR

Commercial grade hydrochloric and sulfuric acids can be used as the acid source in the neutralizing operation. However, spent pickle liquor (K062) generated by the steel industry has been used as a substitute for the commercial grade (virgin) acids for over 40 years. The neutralization, clarification, and wastewater treatment processes are the same regardless of whether virgin acid or spent pickle liquor is used.



Mr. Larry Eastep

August 5, 1987

Page 3

Spent pickle liquor is used as a substitute for virgin acid for several reasons. First, it tends to generate less impurities from the scrap than virgin acid. In addition, the total reaction time in the neutralizers is reduced when spent pickle liquor is used, since the pickle liquor already contains significant amounts of either ferrous sulfate or ferrous chloride from the pickling operations at the steel mills. Finally, the cost of spent pickle liquor is usually lower than that of virgin acids.

The spent pickle liquor arrives at our facility by truck. Samples of each truckload of spent pickle liquor are analyzed to ensure that the liquor contains acceptably low levels of chrome, zinc, aluminum, and other contaminants.

The liquor is unloaded directly from the truck to storage tanks. The liquor is then transferred from the storage tanks to the neutralizers where the scrap iron is added and the reaction takes place. There is no pretreatment of the liquor prior to its use as a substitute for virgin acid in the neutralizing process.

#### CLASSIFICATION OF PFIZER AS A HAZARDOUS WASTE TREATMENT SITE

Spent pickle liquor from steel operations was among the materials included in the listed hazardous wastes (K062) when the Resource Conservation and Recovery Act was passed in 1976. Any facility involved in the neutralization or disposal of spent pickle liquor was therefore classified as a solid waste management site. Pfizer applied for and received the appropriate Federal and Illinois operating permit in order to continue using spent pickle liquor as a substitute for virgin acid (USEPA ID No. ILD 006 317 119 and ILEPA No. 1630450034).

However, in order to encourage the beneficial reuse of hazardous wastes, USEPA adopted new regulations in 1985 which amended the definition of solid wastes. Illinois adopted these same regulations shortly thereafter. Specifically, IL ADM Title 35, Section 721.102, (e) (1) (B) states that "materials are not solid wastes when they can be shown to be recycled by being ... used or reused as effective substitutes for commercial products".

Pfizer maintains that our use of spent pickle liquor as a substitute for commercial grade hydrochloric and sulfuric acids, without pretreatment, falls under the definition of recycle rather than the definition of hazardous waste disposal. We understand this revised definition to mean that our operations no longer are classified as a solid waste management facility and that our operations are no longer subject to RCRA Subtitle C regulations.



Mr. Larry Eastep  
August 5, 1987  
Page 4

In actuality, this will not change the procedure currently in effect in our production operations. We will continue to inspect and maintain our storage and neutralizing systems to minimize the chance for failure. We will continue to train our employees to properly handle acidic materials (whether spent pickle liquor or virgin acids) and to know how to respond to emergencies. We will continue to keep a record of the amount of pickle liquor received and used at our facility (one pickle liquor supplier has requested that we continue to use manifests to track their shipments even though the liquor will no longer be defined as a solid waste). Finally, we will continue to work with IEPA to ensure that all of our operations comply with applicable regulations.

Pfizer requests that IEPA affirm our understanding of the regulations that the E. St. Louis facility is not subject to the RCRA regulations in the use of steel mill pickle liquor (K062).

Please note that much of the information contained in this letter is of a proprietary nature and should be treated as confidential information. This information could be very useful to a competitor.

Please contact our Mr. Jeff Carlton if you have any questions or comments regarding this information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roger E. Rader", written in a cursive style.

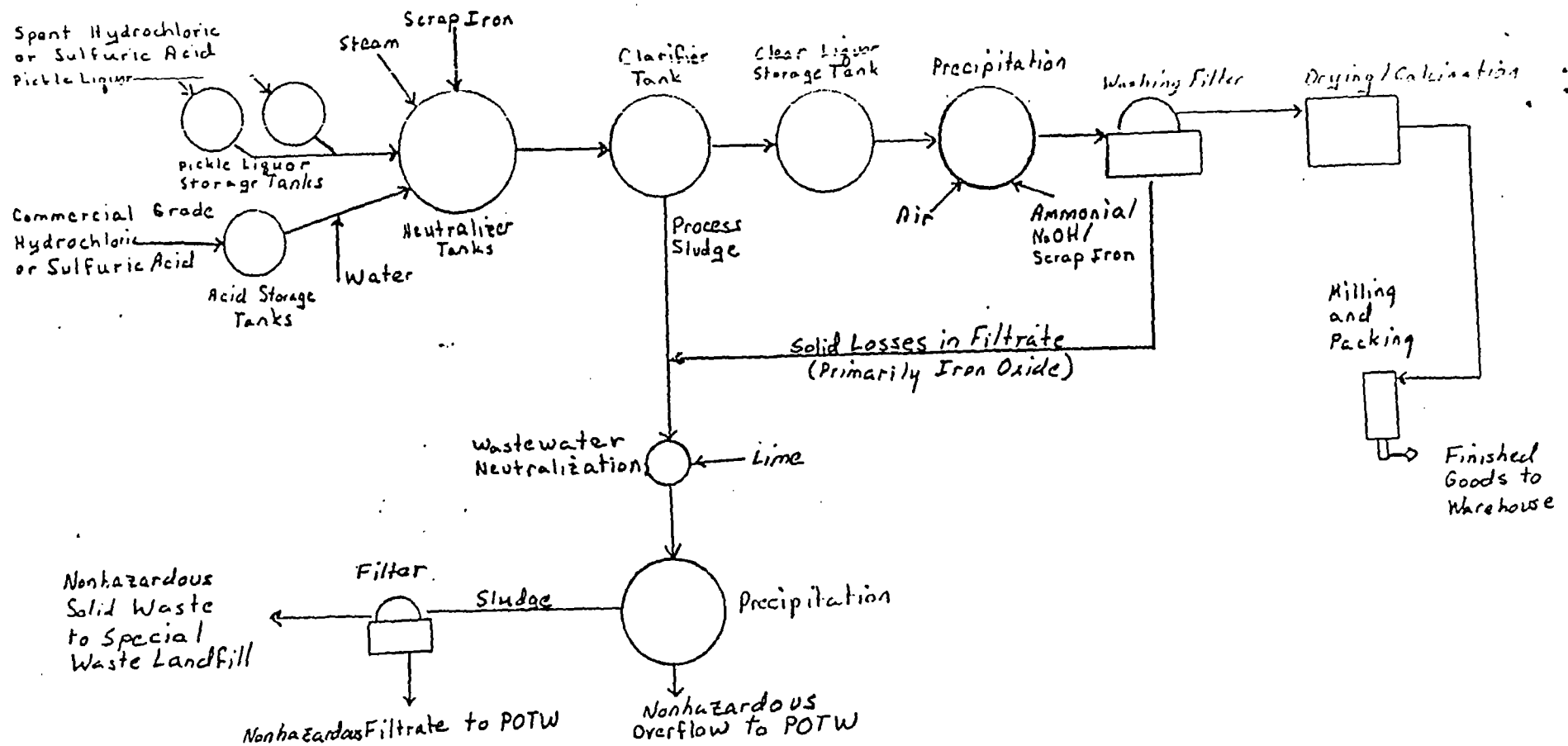
Roger E. Rader  
Plant Manager

Attachment

rm

BCC: J. Carlton  
G. Gray  
W. McCoy  
M. Richardson

# IRON OXIDE PRODUCTION



Note: Commercial grade acids are used in Neutralizer Tanks when Spent Pickle Liquor is not economically available.

CONFIDENTIAL

JCC  
8/6/87



Illinois Environmental Protection Agency • 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1630453004 -- St. Clair County  
East St. Louis/Pfizer, Inc.  
Permit No. 1983-3-OP

September 18, 1986

Jeffrey C. Carlton, P.E.  
Pfizer Pigments, Inc.  
2001 Lynch Avenue  
East St. Louis, IL 62205

Dear Mr. Carlton:

This is in response to your recent letter in which you ask if direct use of spent pickle liquor from steel operations as a substitute for raw material in your manufacturing operation is considered to be hazardous waste treatment. If the spent pickle liquor is directly used without intermediate reclamation as a substitute for a raw material in a manufacturing process, the activity qualifies as use/reuse. Materials that are used/reused are not solid wastes and are not subject to RCRA Subtitle C regulations unless they are speculatively accumulated, used in a manner constituting disposal or burned as a fuel.

Because Pfizer, Inc. has an IEPA Division of Land Pollution Control permit to operate a spent pickle liquor treatment facility, you may receive spent pickle liquor for treatment from any generator provided that you obtain supplemental waste stream permits and the spent pickle liquor is transported using the Agency special waste manifest system.

Apparently, Pfizer, Inc. has the option of using spent pickle liquor directly, without reclamation, in which case it is not a solid waste; or receiving spent pickle liquor for treatment in your facility, in which case it is a solid waste, a RCRA hazardous waste and an Illinois special waste.

If you have further questions, please call me at the above phone number.

Sincerely,

A handwritten signature in cursive script that reads "Eugene P. Thelos".

Eugene P. Thelos, Manager  
Disposal Alternatives Unit  
Permit Section  
Division of Land Pollution Control

EPT:tk:5/5/36

cc: Division File  
Southern Region

✓

*From: J. Carlton*



**PFIZER PIGMENTS INC.**

A subsidiary of Pfizer Inc.  
2001 Lynch Avenue, East St. Louis, Ill 62205

July 16, 1986

Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, Illinois 62706

Attention: Mr. Eugene Theios

Dear Mr. Theios:

On July 15th, I spoke to Mr. Chris Liebman of your Agency requesting a clarification of our hazardous waste treatment permit requirements. I explained that Pfizer had received a hazardous waste treatment/storage/disposal facility permit from USEPA in 1982 and a similar permit from IEPA in 1983 because we use spent pickle liquor from steel operations as a raw material in our operations. Pfizer has used pickle liquor as a substitute for virgin acid for many years. The pickle liquor is stored and used onsite with no pretreatment prior to the production operations. Mr. Liebman told me that since this material is a feed stock material and is not altered or treated before it is used, the pickle liquor is not considered to be a hazardous waste. He suggested that I write to you regarding this matter.

Is our use of spent pickle liquor considered a hazardous waste treatment operation? If not, what regulations still apply to our facility?

Thank you for your assistance in answering our questions.. Please contact me, if you need additional information regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "Jeffrey C. Carlton".

Jeffrey C. Carlton, P.E.  
Safety/Environmental Engineer

JCC:jn



217/732-6762

FEBRUARY 05, 1990  
APPLICATION RECEIVED: 01/25/90  
PERMIT NUMBER 923182-1630450034  
PERMIT ISSUED TO:

WASTE STREAM NUMBER 923182  
PERMIT EXPIRES: 12/12/91

PFIZER INC  
2001 LYNCH AVE  
EAST ST LOUIS

IL  
62201

PFIZER INC  
2001 LYNCH AVE  
EAST ST LOUIS

IL  
62201

WASTE NAME: SPENT PICKLE LIQUOR - STEEL DP USEPA HAZARDOUS WASTE NUMBERS:  
WASTE CLASS: 48 HAZARDOUS NOT SUBJECT TO FEE: K062

PERMIT TO RECEIVE THE INDICATED WASTE IS GRANTED.

✓ SITE NAME: PFIZER INC

IEPA SITE NO.: 1630450034

DISPOSITION OF WASTE: 20  
RECYCLE, REUSE, OR RECLAMATION

WASTE TREATMENT: 04  
REACTIVE WASTE TREATMENT  
STORAGE:

ATTENTION: P.N. SCHLINGMAN  
WASTE GENERATOR: LTV STEEL CO  
HENNEPIN WORKS  
P.O. BOX 325  
HENNEPIN

IL  
61327

IEPA GENERATOR NO.: 1558010006  
LTV STEEL CO-WELL  
STATE ROUTE 71

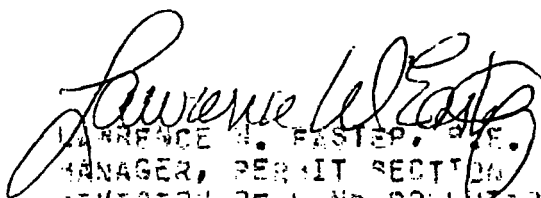
HENNEPIN

IL  
61327

THIS PERMIT IS GRANTED SUBJECT TO THE ATTACHED STANDARD CONDITIONS AND  
ANY SPECIAL CONDITIONS LISTED BELOW.

1. THE GENERATOR CODE LISTED ON THE APPLICATION WAS INCORRECT AND AN  
AGENCY CORRECTION HAS BEEN MADE. PLEASE USE THE CODE LISTED ON THIS  
PERMIT LETTER ON ALL FUTURE MANIFESTS AND PERMIT APPLICATIONS  
PERTAINING TO THIS FACILITY.

LWE:AJC  
CC:LTV STEEL CO  
REGION: COLLINGSVILLE

  
LAWRENCE H. EASTER, M.E.  
MANAGER, PERMIT SECTION  
DIVISION OF LAND POLLUTION CONTROL



217/782-6762

MARCH 23, 1990

PFIZER INC  
ATTENTION:  
2001 LYNCH AVE  
EAST ST LOUIS , IL 622010000

GENERATOR NUMBER: 1630450034

DEAR SPECIAL WASTE GENERATOR:

SPECIAL WASTE DISPOSAL, TREATMENT, OR STORAGE PERMIT(S) NAMING YOUR FACILITY AS THE GENERATOR OF THE WASTE ARE DUE TO EXPIRE IN AUGUST 1990. WE HAVE INFORMED THE HOLDERS OF THESE PERMITS (THE DISPOSAL, TREATMENT, OR STORAGE SITE) OF THIS, AND YOU MAY BE CONTACTED BY THEM TO PROVIDE WASTE STREAM INFORMATION FOR THEIR PERMIT RENEWAL APPLICATION. THE PERMITS AND SITES ARE LISTED BELOW FOR YOUR CONVENIENCE.

IT IS NOT NECESSARY FOR YOUR FACILITY TO CONTACT THE AGENCY, IN ORDER TO RENEW THE PERMITS. ONLY THE PERMITEE, I.E. THE DISPOSAL, TREATMENT, OR STORAGE SITE, CAN MAKE APPLICATION FOR A PERMIT.

IT CLEARLY IS IN YOUR INTEREST TO KNOW THAT THESE PERMITS WILL EXPIRE BECAUSE THE SITE CAN NOT LEGALLY CONTINUE TO ACCEPT YOUR WASTE AFTER THE PERMIT EXPIRATION DATE UNLESS THE PERMIT HAS BEEN RENEWED.

PERMIT AUTH #	(DISPOSAL, STORAGE, TREATMENT) SITE #	NAME	EXPIRE DATE	CURRENT CLASSIFICATION
1 050796	1630100001	LADLAN WASTE SYSTEMS INC	08/08/90	NON-HAZARDOUS